## SWANSON, MARTIN & BELL, LLP

ATTORNEYS AT LAW

330 NORTH WABASH • SUITE 3300
CHICAGO, ILLINOIS 60611
(312) 321-9100 • FAX (312) 321-0990

Writer's Direct Line: 312-222-8569 E-mail: jgould@smbtrials.com

March 20, 2020

## **VIA E-MAIL**

Attention: EPA FOIA Coordinator Regional Freedom of Information Officer U.S. EPA, Region 5 77 West Jackson Boulevard (MI-10J) Chicago, IL 60604-3590 (312) 886-6803

Re: Freedom of Information Request –EPA Investigations and Citations involving

General Electric's facility in Bloomington, IL (1601 Ge Rd, Bloomington, IL 61704) and/or Union Asbestos & Rubber Company (a/k/a "UNARCO")'s facility in

Bloomington, IL (1111 W. Perry Street, Bloomington, IL, 61701)

## Dear FOIA Coordinator:

Pursuant to the Freedom of Information Act, 5 U.S.C. §552, we request access to and copies of any and all records, correspondence, reports, citations, memoranda, photographs, witness statements, notes, surveys, maps, layouts, schematics, photos or any other documents generated in connection with any environmental or health-related investigations regarding **General Electric's facility in Bloomington**, **IL** and/or UNARCO's facility in Bloomington, IL, including asbestos, silica, chemical fumes, or any other toxic or hazardous compounds (1957-2010).

In accordance with the Freedom of Information Act, please provide us with complete copies of any and all (1) records, (2) investigatory reports, (3) decisions and orders, and (4) citations regarding any relevant incidents in connection with any environmental or health-related hazards (i.e. asbestos, silica, chemical fumes, or any other toxic or hazardous compounds).

This request is being made with regard to civil litigation to which the United States and EPA are not and will not be parties. We represent Hyster-Yale Group, Inc. in civil litigation brought by the Estate of David Bray that is currently pending in Mclean County, Illinois (Case No. 18 L 178).

We will be happy to reimburse your office's reasonable costs in connection with processing this request. Please contact me directly should you have any questions.

Very truly yours,

Swanson, Martin & Bell, LLP

Jack A. Gould